



## TEXAS CATTLE FEEDERS ASSOCIATION

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April 7, 2003

Country of Origin Labeling Program  
Agricultural Marketing Service  
U.S. Department of Agriculture  
Stop 0249, Room 2092  
1400 Independence Avenue, S.W.  
Washington, D.C. 20250-0249

#### Reference: Country of Origin Labeling

Texas Cattle Feeders Association (TCFA) commends USDA for using these voluntary guidelines as the basis for mandatory Country of Origin Labeling (COOL). This should assist in the rapid development of the mandatory guidelines so producers will know what records are necessary before the implementation of mandatory COOL on September 30, 2004.

It's imperative that regulations to implement COOL as mandated by the 2002 Farm Bill have integrity to insure consumer confidence. It would be a detriment to the beef industry to allow COOL to affect the creditability of voluntary beef labeling programs. The organic labeling program, approved last fall by USDA, has lost creditability because of Rep. Nathan Deal's amendment that prevents USDA from spending funds to enforce the organic certification of livestock unless organic feed is no more than twice the cost of conventionally produced feeds. USDA must not give into political pressure from activists groups within the beef industry that want to make a sham of COOL.

We must not discriminate against our Canadian and Mexican neighbors. Mexico has become the second largest importer of U.S. beef and beef products. We must not jeopardize this market with artificial trade barriers that create retaliation against our products. Labeling requirements must be consistent for domestic and imported beef as required by law.

It's USDA's responsibility to protect the integrity of labeling problems. Some say that USDA should not require a "verifiable recordkeeping audit trail" because the Act says "may" instead of "shall." If it wasn't Congress' intent to have a creditable program by inserting the language of a "verifiable recordkeeping audit trail," then why is that statement in the Act?

We strongly support the statement: "To have a meaningful program, retailers and their down-line suppliers will have to maintain a verifiable audit trail on covered commodities to substantiate country of origin labeling claims."

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It's imperative that USDA protect producers from some within the industry who may attempt to use this as a source of income. The majority of calves go through a market at least one time and many go through twice. In many cases, this will be the first step to document "born and raised" in the U.S.

Labeling requirements must be flexible and we strongly agree with the statement: "Recognizing retailers and their suppliers may have different accounting and inventory documentary systems; various forms of documentation will be acceptable provided the necessary tracking information is available."

TCFA believes the mandatory guidelines must mirror the voluntary guidelines as intended by Congress. The guidelines must be implemented as soon as possible since calves are being born that must be properly identified.

We respectfully request that USDA take comments submitted by April 9 and comments received during the 12 listening and education sessions, ending on June 26, and develop the final regulations on mandatory COOL within 90 days so producers will know what record requirements will be required.

Sincerely,

A handwritten signature in black ink, appearing to read "Richard McDonald".

Richard McDonald  
President & CEO